



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
215 Fremont Street  
San Francisco, Ca. 94105

To RAR  
Bob - FYI  
Mabel - file  
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MAR 30 1987

In reply  
Refer to: W-6-2

M.G. Mefferd  
State Oil and Gas Supervisor  
Division of Oil and Gas  
1416 9th Street, Room 1310  
Sacramento, CA 95814

Dear Mr. Mefferd:

This letter is to respond to the aquifer exemption request and the injectivity testing proposed by Texaco Producing Inc. of the Monterey Formation "C" and "D" sands in well "Rosenberg (NCT-1)" WI-13, located near the San Ardo Field. Upon review of the information submitted, we believe that an aquifer exemption is inappropriate at this time. Therefore, injectivity tests may be conducted by Texaco without an aquifer exemption under the review and requirements of the California Division of Oil and Gas (Division).

Since the operator only proposes to inject fresh water mixed with NaCl in concentrations which closely match the salinity of formation waters in the "C" and "D" sands and not any produced water, the proposed injectate is not a Class II waste. Therefore, the "Rosenberg" WI-13 well would not be a Class II well during the period when injectivity tests are conducted on the well. This particular well is more appropriately classified as a Class V well during the hydrogeologic testing.

We have reviewed Texaco's test methodology which proposes the injection of simulated brine into the test formation (i.e., not actual produced water but prepared saline water with no toxic additives or other constituents) and concluded that there is no apparent endangerment. However, the Division should regulate wells during the hydrogeologic testing when the intended purpose of the test is clearly for Class II waste injection evaluation. We also recommend that the Division restrict such hydrogeologic tests to a certain time interval (e.g., no longer than 30 days), certain quality of injectate (e.g., simulated brine of better quality than the injection zone), and total volume of injectate (e.g., not to exceed 300,000 barrels).

I recognize that EPA has not been responding to aquifer exemption requests in a timely manner. To remedy this, I recommend that our staffs meet to improve the process and revise the basic information necessary to evaluate any request for a new aquifer exemption. At a minimum, I believe additional information should be provided which rules out the following alternatives to a new aquifer exemption:

1. the reinjection of produced water into the production zone;
2. the injection of produced water into zones which are not classified as underground sources of drinking water;
3. the transport of the produced water for reinjection or disposal into currently approved zones; and
4. other alternative means of disposal by injection.

We will call you next week to establish a meeting to improve the aquifer exemption process. If you have any questions regarding our determination on Texaco's proposal, please call Nathan Lau at (415) 974-0893 or Janet Hashimoto at (415) 974-0827.

Sincerely,



Steve Pardieck, Chief  
Drinking Water Branch

cc: Ken Henderson, CDOG District 3  
Al Koller, CDOG District 3